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National Association as trustee
of Igloo Series IV Trust
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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	: CASE NO.: 19-10082-SLM
IN RE:	:
	: CHAPTER: 13
Michael M Tallarida & Nicole J Tallarida <i>aka</i>	:
Nicole J Pilla	: HON. JUDGE.:
	: Stacey L. Mesisel
Debtor(s)	:
	: HEARING DATE:
	: September 13, 2023 at 10:00 AM

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OBJECTION TO DEBTORS' MOTION TO REINSTATE STAY AS TO CREDITOR U.S.
BANK TRUST NATIONAL ASSOCIATION AS TRUSTEE OF IGLOO SERIES IV
TRUST

PLEASE TAKE NOTICE that SN Servicing Corporation as servicer for U.S. Bank Trust National Association as trustee of Igloo Series IV Trust (hereinafter "Secured Creditor"), the holder of a mortgage on real property of the Debtor, located at 101 Brookline Avenue, Nutley, NJ 07110 by and through its undersigned attorneys, hereby objects to the Debtor's Motion to Reinstate the Stay on the following grounds:

1. The Debtor filed a Chapter 13 Bankruptcy Petition on January 3, 2019.
2. On September 18, 2020, a Motion for Relief from the Automatic Stay and Joint-Debtor Stay was filed by Secured Creditor.
3. A hearing was held on the Motion for Relief from the Automatic Stay and Co-Debtor Stay on October 14, 2020.

4. On November 25, 2020, an Order Resolving the Motion for Relief from the Automatic Stay was entered by the Court.
5. On July 18, 2023, Secured Creditor filed a Certification of Default.
6. On August 2, 2023, an Order Vacating Automatic Stay and Co-Debtor Stay was entered by the Court.
7. The Debtor now seeks the entry of an order reinstating the Automatic Stay as to Secured Creditor.
8. Debtor's Motion relies on the proposition that the Debtors had mistakenly made their payment to the former servicer, Rushmore Loan Management Services, LLC after the loan had been transferred to Secured Creditor.
9. Upon review of internal records, Debtors' account is due for the post-petition payments for the months of July 14, 2023, through and including August 14, 2023, in the amount of \$2,681.41, less debtor's suspense in the amount of \$1,500.00. Arrears total \$3,862.82 due through August, 2023.
10. Secured Creditor objects to the reinstatement of the automatic stay unless and until the Debtors have fully brought the account current on all post-petition obligations through the date of any entered Order.

WHEREFORE, Secured Creditor respectfully requests that the Debtor's Motion be denied for the reasons outlined above and for all other and further relief as is just and proper.

Dated: Garden City, NY
September 6, 2023

By: /s/ Charles Wohlrab
Charles Wohlrab, Esq.
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Chapter: _____

Adv. No.: _____

Hearing Date: _____

Hon. Judge: _____

CERTIFICATION OF SERVICE

1. I, _____ :

☐ represent _____ in the this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in the this matter.

☐ am the _____ in the this case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: _____

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)